## UNITED STATES BANKRUPTCY COURT EASTERN DISTRICT OF VIRGINIA Richmond Division

In re:		Case No.
	LeClairRyan, PLLC, <sup>1</sup>	19-34574-KRH
	Debtor	Chapter 7

### **NOTICE OF MOTION AND HEARING THEREON IF NECESSARY**

PLEASE TAKE NOTICE Lynn L. Tavenner, Trustee, and not individually but solely in her capacity as the Chapter 7 trustee of the bankruptcy estate of LeClairRyan PLLC, in the above-referenced Chapter 7 case (the "Case"), by counsel, filed the NINTH MOTION FOR ENTRY OF FURTHER ORDER EXTENDING THE CHAPTER 7 TRUSTEE'S TIME TO ASSUME, REJECT, AND/OR ASSIGN CERTAIN EXECUTORY CONTRACTS AND/OR LEASES OF PERSONAL PROPERTY PURSUANT TO 11 U.S.C. § 365(d)(1) (the "Motion"). A Copy of the Motion may be obtained by written request to pberan@tb-lawfirm.com.

PLEASE TAKE FURTHER NOTICE that your rights may be affected. You should read the Motion carefully and discuss them with your attorney if you have one in this chapter 7 Case. (If you do not have an attorney, you may wish to consult one).

PLEASE TAKE FURTHER NOTICE on September 4, 2019, the Court entered the Order Establishing Certain Notice, Case Management and Administrative Procedures [ECF. No. 38] (the "Case Management Order"), which approved the Notice, Case Management, and Administrative Procedures attached as Exhibit 1 to the Case Management Order (the "Case Management Procedures"). The Case Management Procedures, among other things, prescribe the manner in which Objections must be filed and served and set forth when certain hearings will be conducted. A copy of the Case Management Order may be obtained, free of charge, by written to request to pberan@tb-lawfirm.com or, for a fee, at <a href="https://ecf.vaeb.uscourts.gov">https://ecf.vaeb.uscourts.gov</a>.

**PLEASE TAKE FURTHER NOTICE** if you do not want the Court to grant the relief requested in the Motion, or if you want the Court to consider your views on the Motion, then, by

Paula S. Beran, Esquire (Va. Bar No. 34679) Tavenner & Beran, PLC 20 North Eighth Street, Second Floor

Richmond, Virginia 23219 Telephone: (804) 783-8300 Telecopy: (804) 783-0178

<sup>&</sup>lt;sup>1</sup> The principal address of the Debtor as of the petition date was 4405 Cox Road, Glen Allen, Virginia 23060, and the last four digits of the Debtor's federal tax identification number are 2451.

# December 14, 2021 (the "Objection Deadline"), you or your attorney must:

File with the Court, either electronically or at the address shown below, a written response to the Motion pursuant to Rule 9013-1(H) of the Local Rules of the United States Bankruptcy Court for the Eastern District of Virginia and the Case Management Procedures. If you mail your written response to the Court for filing, you must mail it early enough so the Court will **receive** it on or before the Objection Deadline.

If a response is not properly and timely filed and served, the Court may deem any opposition waived, treat the Motion as conceded and enter appropriate order(s) granting the requested relief without further notice or hearing.

Clerk of the Court United States Bankruptcy Court 701 East Broad Street, Suite 4000 Richmond, VA 23219

In accordance with the Case Management Procedures, you must also serve a copy of your written Objection on the Core Parties, the 2002 List Parties and any Affected Entity so that the Objection is received on or before the Objection Deadline.

**PLEASE TAKE FURTHER NOTICE THAT** the Court will entertain the Motion on December 21, 2021, at 11:00 a.m. (or such time thereafter as the matter may be heard). The hearing will take place via Zoom:

### Zoom registration link:

https://www.zoomgov.com/meeting/register/vJIsd-qqqz8tG9qsUkSU3LiI8AdYy70rypk

Listen-only conference line:

Dial: 1-866-590-5055 Access Code: 4377075 Security Code: 122121

**PLEASE TAKE FURTHER NOTICE THAT** you should consult the Case Management Procedures before filing any written response.

PLEASE GOVERN YOURSELVES ACCORDINGLY.

Respectfully submitted,

LYNN L. TAVENNER, CHAPTER 7 TRUSTEE

Dated: November 30, 2021 Richmond, Virginia By: /s/ Paula S. Beran
Paula S. Beran, Esquire (VSB No. 34679)

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Counsel for Lynn L. Tavenner, Chapter 7 Trustee

### **CERTIFICATE OF SERVICE**

Pursuant to the Local Rules of this Court, I certify that on or before the 30th day of November 2021, a true copy of the foregoing Notice was sent electronically and/or by first-class mail to: (a) the Office of the United States Trustee; (b) the Debtor's 20 Largest Unsecured Creditors; (c) all known secured creditors from the Debtor's Official Form 106D; (d) the Core Parties and 2002 List as defined in the *Case Management Order*; and (e) all parties requesting service of pleadings in this Case (as indicated on the Schedule A attached to the Court filed copy of this Notice).

/s/ Paula S.Beran Counsel for Lynn L. Tavenner, Chapter 7 Trustee